

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jonathan URSO

Case: 2:23-mj-30383

Assigned To : Unassigned

Assign. Date : 9/19/2023

CMP: USA v URSO (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 18, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

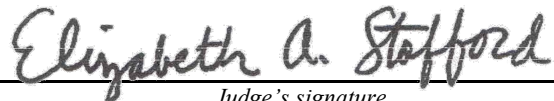
18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 19, 2023City and state: Detroit, Michigan*Complainant's signature*Special Agent Ryan Thick - ATF*Printed name and title**Judge's signature*Honorable Elizabeth Stafford, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Introduction and Agent Background

I, Special Agent Ryan Thick, being first duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent with the Bureau of Alcohol Tobacco, Firearms and Explosives (ATF) since November of 2022. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. I have a bachelor's degree in criminal justice and master's degree in business management and leadership.

2. Before my employment with ATF, I was employed as a United States Pretrial Probation Officer in Detroit, MI, and Springfield, IL, for approximately one year and employed with the Michigan Department of Corrections as Probation Parole Officer in Flint, MI, for approximately five years. As Probation Parole Officer with the Michigan Department of Corrections, I was assigned to the Federal Bureau of Investigation (FBI) Flint Safe Streets Task Force for approximately one year. As an FBI Embedded Agent and Special Agent with the ATF, I have participated in numerous state and federal investigations to include illegal narcotics, gang investigations, and firearms investigations.

3. This affidavit is based on my personal knowledge and on my participation in this investigation; information I received from other law enforcement agents and officers; and information I gained through my training and experience. This affidavit merely establishes sufficient probable cause for the requested warrant and does not set forth all the facts known to law enforcement regarding this investigation.

Probable Cause

4. The United States, including the ATF, is currently investigating Jonathan Andrzej Urso (W/M, DOB: XX/XX/XX89) (“URSO”), a convicted felon, for knowing possession of one (1) firearm has previously traveled in and affected interstate commerce in violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

5. I reviewed a criminal history check for URSO. This check revealed URSO was convicted of the following felony offenses:

- a. 2017-3rd Circuit Court Wayne County, Michigan, Felony Home Invasion- 1st Degree.
- b. 2019- 3rd Circuit Court Wayne County, Michigan, Felony Breaking & Entering a Vehicle with Damage to a Vehicle.

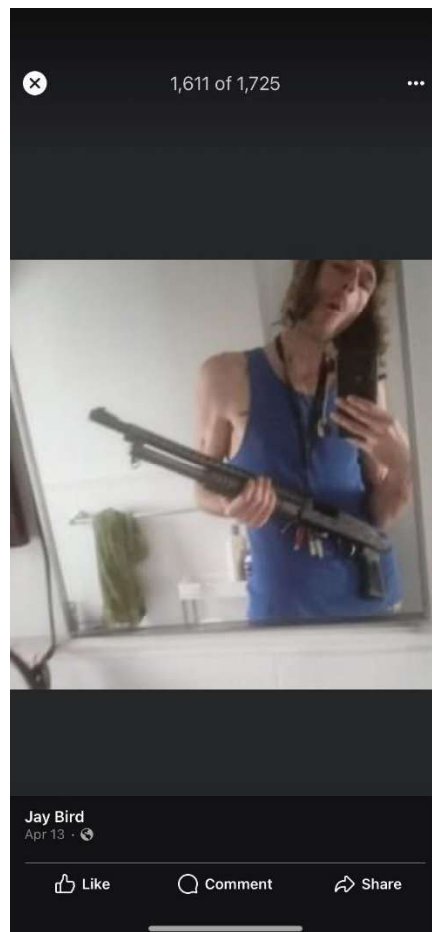
6. Because URSO has been convicted of multiple felony offenses, at least one for which he was sentenced to more than a year in prison, there is probable cause to believe that URSO is aware of his status as a convicted felon.

7. On September 15, 2023, the ATF received a tip from an individual whose identity is known to investigators, including the undersigned (hereinafter, “Confidential Source” or CS). CS has not previously provided information to law enforcement. CS did not provide information in this case in exchange for or in hopes of any financial or judicial consideration. The information provided by CS was specific, detailed, and based on their firsthand observation or on conversations directly with URSO. Several details of the information provided by CS have been independently corroborated during the course of this investigation. CS reported that they have seen a shotgun at URSO’s residence and that CS, as well as other members of the public, are in fear of URSO’s capacity to commit acts of violence with a firearm. CS also advised that URSO had potentially injured small animals, possibly killing them; for example, breaking a cat’s leg and posting about it on YouTube. CS stated URSO no longer lives at 25006 Midland Ave, Redford, Michigan, 48239, because he was evicted. CS reported URSO is always exercising at a Planet Fitness in the Livonia, Michigan, area.

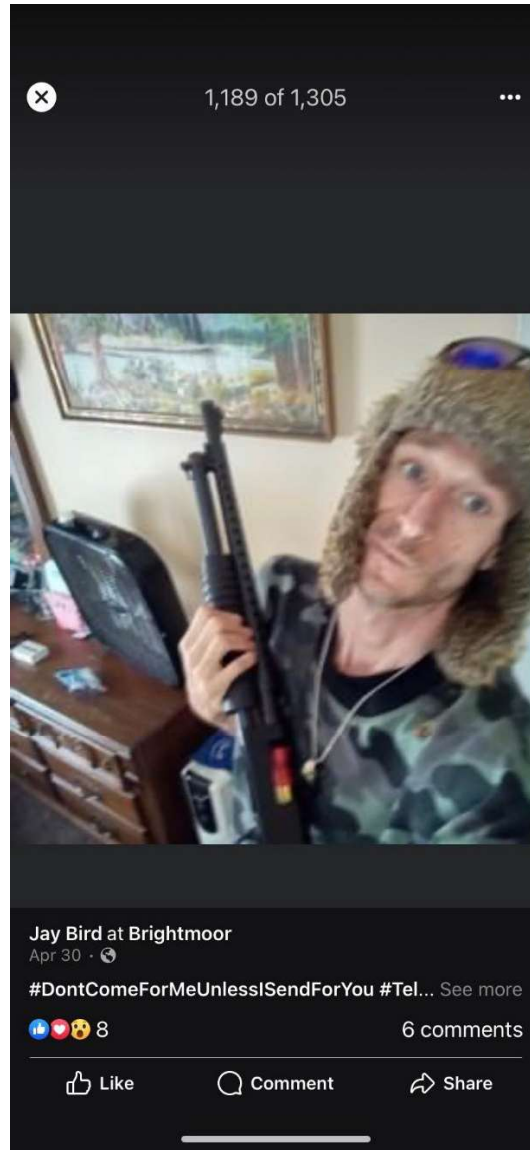
8. On September 18, 2023, ATF Special Agents conducted a public record Facebook and YouTube search. Upon searching Facebook and YouTube,

ATF Special Agents came across multiple pictures of URSO holding what appeared to be one (1) black 12-gauge shotgun. In a YouTube video titled, “#yourboi #retrospect #outskirts,” URSO made threats toward his family. In this same video, ATF Special Agents observed a video of URSO removing gun powder from a Winchester shotgun shell (allowing URSO to test fire without live round going off). ATF Special Agents observed URSO test fire the shotgun at his last known residence.

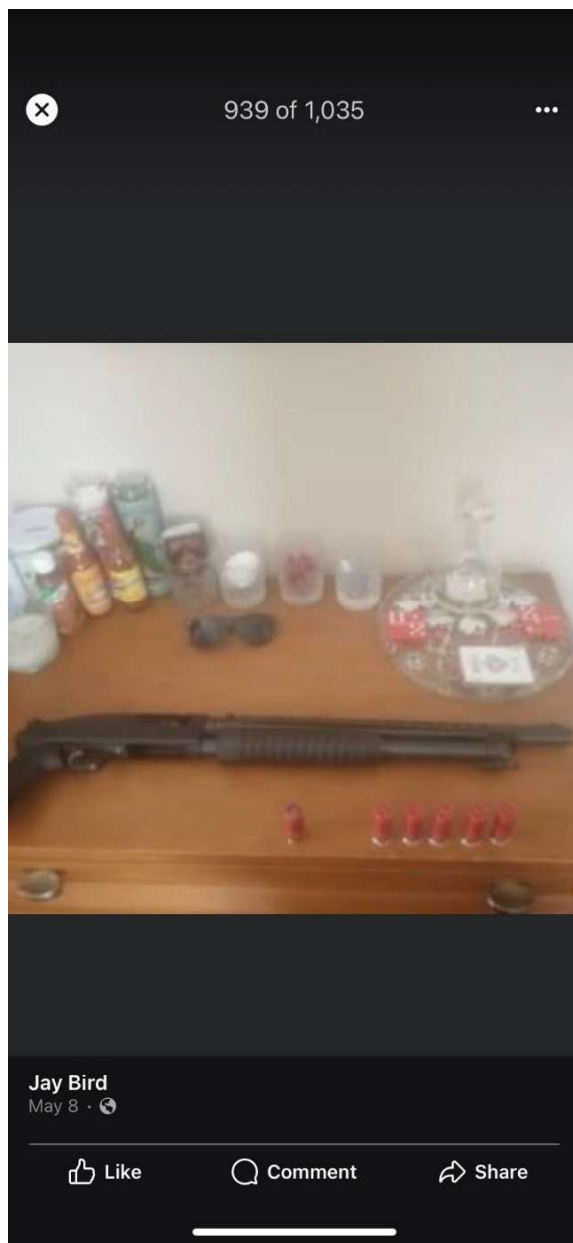
9. On April 13, 2023, URSO posted a picture of him holding a black shotgun. Below is a screenshot of URSO’s Facebook account “Jay Bird.”



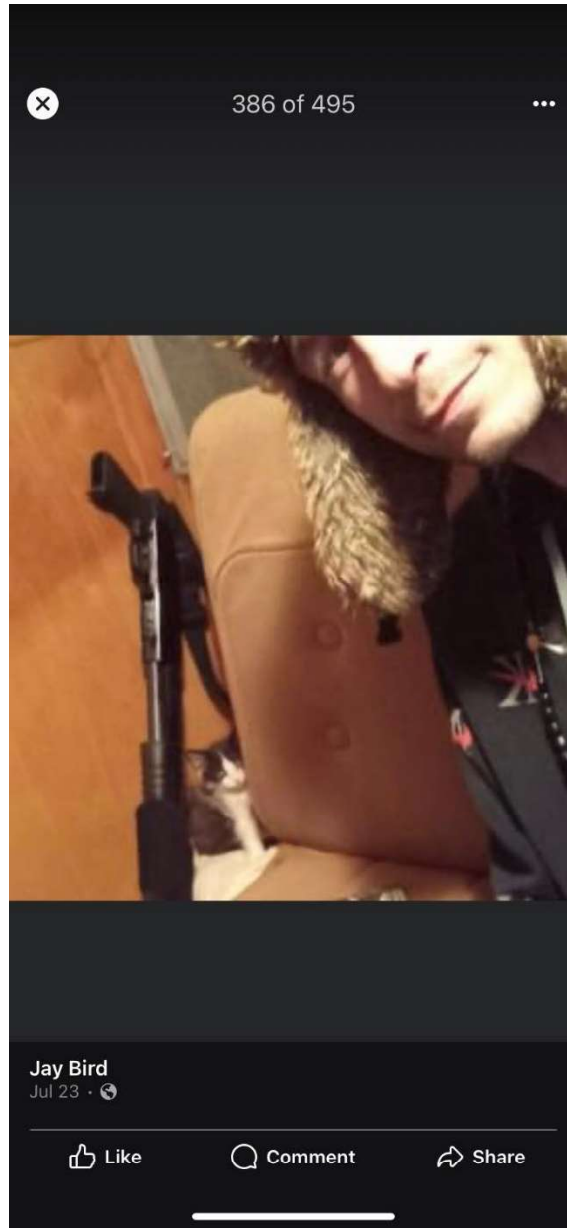
10. On April 30, 2023, URSO posted a picture of him holding black shotgun with a live shotgun shell. Below is a screenshot of URSO's Facebook account "Jay Bird."



11. On May 8, 2023, URSO posted a picture of a black shotgun. Below is a screenshot of URSO's Facebook account "Jay Bird."



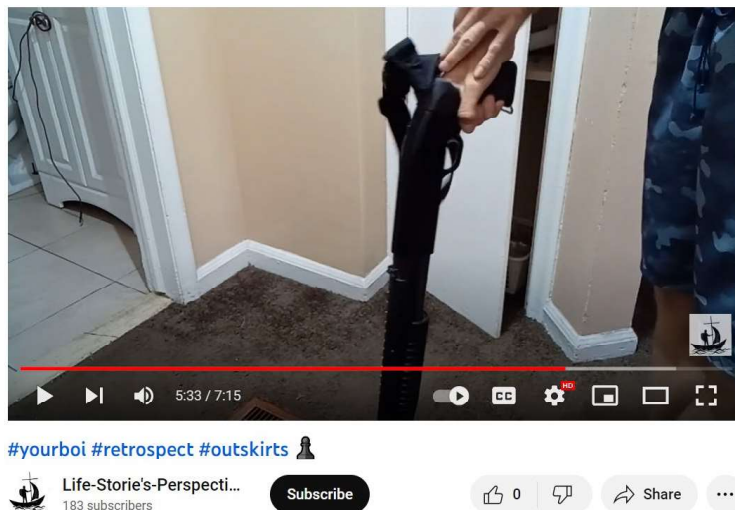
12. On July 23, 2023, URSO posted a picture of him sitting next to a black shotgun. Below is a screenshot of URSO's Facebook account "Jay Bird."



13. On July 14, 2023, URSO posted a video of him showing of a black shotgun. Below is a screenshot of URSO's YouTube account "Life-Storie's-Perspectives."



14. On July 14, 2023, URSO posted a video of him test firing showing a black shotgun. Below is a screenshot of URSO's YouTube account "Life-Storie's-Perspectives."



15. ATF Special Agents also observed, in one YouTube video, URSO claiming to breaking a bone of his cat's leg. URSO stated that the cats leg bone was sticking out of the cats' skin. URSO then went on to show the cat in several portions of the video and made a splint, with the assistance of his grandmother, to try and repair the cat's broken leg. URSO made several stated claims in the video to having broken the cat's leg himself.

16. On September 18, 2023, ATF Special Agents contacted CS to discuss the anonymous tip reported. CS advised that URSO had been evicted from his home and that he had been living in his vehicle and had all his belongings with him.

17. On September 18, 2023, ATF Special Agents conducted undercover surveillance of areas to be frequented by URSO based off social media posts. While conducting surveillance, Agents observed URSO sitting in the driver seat of his vehicle (a black Ford Focus recognized from social media post), which was parked in the parking lot of McDonalds at 34900 Warren Road in Westland, Michigan. The vehicle bears Michigan License Plate number (XXX-9610) and was confirmed to be registered to Jonathan URSO.

18. ATF Special Agents then contacted Westland Police Department and advised they were conducting surveillance of a felon possibly in the possession of a firearm and possible danger to the community. A Westland police officer arrived

at the location. He ran the license plate of the Ford Focus through law enforcement computer system and found the vehicle does not have valid vehicle insurance as required by Michigan law.

19. The Westland police officer then pulled up to and made consensual contact with URSO, who was seated in the vehicle's driver seat alone. The officer then asked URSO to exit the vehicle for officer safety and URSO complied. URSO was then patted down for weapons with negative results and asked if there were any weapons in the vehicle. URSO stated he did not have a weapon and did not have a driver's license on his possession, which he claimed was somewhere in the vehicle. URSO then gave the officer consent to search the vehicle. The officer located in URSO's vehicle a gray backpack containing one (1) Mossberg, model 500A, 12-gauge shotgun, bearing serial number K041809 loaded with five shotgun shells. The officer then placed URSO under arrest for felon in possession of firearm and possession of dangerous weapon.

Interview of Jonathan Urso

20. On September 18, 2023, ATF Special Agent Ryan Thick and Special Agent Michael Jacobs conducted a recorded interview of URSO at Westland Police Department. SA Thick advised URSO of his Miranda Rights. URSO indicated he understood his rights and was willing to voluntarily make a statement.

21. URSO was questioned about his arrest by Westland Police Department. URSO admitted to possessing a Mossberg 500 shotgun and that he obtained it through a trade from an individual on Facebook Marketplace. URSO stated that he knew he was not allowed to possess a firearm based on him knowing he is a convicted felon. URSO stated he spent approximately three years in prison for “robbing drug dealers” and breaking into cars.

22. The undersigned consulted with SA Michael Jacobs, who is an ATF interstate nexus agent. SA Jacobs has specialized knowledge experience and training as it relates to firearms and firearms identification. Based on his review and the information provided, SA Jacobs opined that the Mossberg, model 500A, 12-guage shotgun, bearing serial number K041809, is a firearm as defined under 18 U.S.C. § 921(a)(3). He also concluded that the firearm was manufactured outside the State of Michigan, thereby having travelled in and affected interstate commerce.

Conclusion

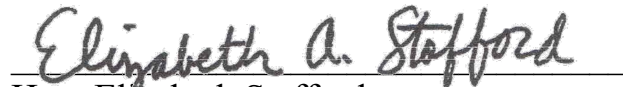
23. Based on the above information, there is probable cause to believe that URSO, a prior convicted felon, knowingly possessed one (1) firearm – specifically, a Mossberg, model 500A, 12-gauge shotgun, bearing serial number K041809 in violation of 18 U.S.C. § 922 (g)(1).

Respectfully Submitted,



Ryan Thick, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth Stafford
United States Magistrate Judge

Dated: September 19, 2023